



November 28, 2007

Subject: West Coast Governors' Agreement on Ocean Health, Draft Action Plan
Public Comments

Dear Sir/Madam:

For the past three years I have been working with Scripps Institution of Oceanography (SIO) as a consultant overseeing preparation of the La Jolla Shores Coastal Watershed Management Plan and assisting with their NPDES Discharge Permit and Ocean Plan Exception. The La Jolla Shores Coastal Watershed Management Plan is focused on protection of two adjacent Areas of Special Biological Significance (ASBS) and aims to elevate the process of ocean protection to recognize the importance not only of water quality, but of biological impacts and physical conditions (circulation patterns, current, etc.). Through my work with SIO, I have become aware the complex nature of ocean protection and am pleased to be able to share some of my experience through my comments on the West Coast Governors' Agreement on Ocean Health, Draft Action Plan.

First, I would like to compliment you on a very well drafted plan. It defined the issues well and is very thorough with a good process for measuring accomplishments. I hope that my comments, which are attached, will help make the plan even more applicable and successful.

If you have any questions, please contact me at (760)212-9129 or by email at msashford@gmail.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Meleah S. Ashford", written in a cursive style.

Meleah S. Ashford, P.E.
President

enclosures

#	Page No. & Paragraph	Comment
1	P-11, 3 rd PP	Aerial deposition on roadways from vehicle exhaust in densely populated areas is also a significant source of metals in storm water runoff to the ocean. See comment 3.
2	p-12, 2 nd pp	There is also a need for a robust information management system to handle all the data being collected
3	New pp	This section should recognize that marine species are particularly sensitive to metals. A large source of metals in urbanized areas is from stormwater carrying aerially deposited brake dust, exhaust particulates and tire wear. Reference: http://www.suscon.org/brakepad/pdfs/SFEI_Castro_Valley_Air_Deposition_Study_FINAL_Report_23May05.pdf and http://www.suscon.org/brakepad/reference/
4	p-15	Air Quality – This section needs to recognize the role of land-based air pollution, i.e., aerial deposition from roadways and commercial areas that is discharged into the ocean with stormwater runoff.
5	p-16	Polluted Runoff, Action 1.1 – The biggest funding problem in California is Prop. 218, which does not allow local governments to access fees for urban runoff programs without a full vote of the people. Prop 218 needs to be revoked or storm drain systems need to be formally defined as a utility so that fees can be assessed.
6	p-17	Marine Debris – A plastics tax should be considered to pay for clean up, recycling and incentive programs
7	p-23	Action 2.1 – There is a need to develop a prioritization matrix for ocean protection so that resources are properly distributed. Action 2.1 could also include a system to rate and rank area based on indicators such as, size of contributing watershed, percent imperviousness of watershed, water quality of discharges into areas, sensitivity of the marine system (biological, physical and chemical).
8	p-27	Action 3.1 – To make this effort successful will require much input, definition, technical support because the definition and goals for ecosystem management are very broad.
9	p-27	Action 3.1 – Community-based efforts are generally focused on watershed management. In this case, the scope of watershed management can be expanded to include the ocean near-shore environments.
10	p-27	Action 3.2 – This is a very important action and ties into Comment 7 about the need for prioritization of ocean areas. The La Jolla Shores Plan focused on this effort. Reference: http://cordc.ucsd.edu/projects/asbs/ This site provides a link to the draft plan and also demonstrates the beginnings of an information management system for ocean protection.
11	p-35	Action 5.2 – “Support” should be changed to “Perform”. The WCGA is a powerful platform to reach decision makers since it is coming direct from the Governors. The biggest problem with education is getting decision makers on board. This program could get their attention, particularly for appointed position.
12	p-36	Priority Area 6 – Vision and Goals – Because of the magnitude of data that is planned to be collected, developing an information/data management system is critical and should be identified as an action item.
13	p-39	Finding 6B – Discuss the need for information/data management
	p-50	Action 3.2 (Activities) – Note that in California there are several efforts underway including the Ocean Protection Council, the SWRCB Natural Water Quality Committee, and SCCWRP's Bight '08 program.